

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

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|----------------------------------|---|-----------------------------------|
| FIREMAN'S FUND INSURANCE COMPANY | : | CIVIL ACTION NO.: 04-11578 PBS |
| v. | : | |
| FIRE SYSTEMS, INC.; | : | |
| FIRE SUPPRESSION SYSTEMS OF | : | |
| NEW ENGLAND, INC.; | : | |
| PRO CON, INC. | : | |
| and | : | |
| PAQUETTE ELECTRIC COMPANY, INC. | : | |
| Defendants | : | AUGUST 21, 2006 |

PLAINTIFF FIREMAN'S FUND'S RULE 26(a)(2)(A)
DISCLOSURE OF EXPERT WITNESS

NAME AND ADDRESS OF WITNESS

James G. DiChaira
Magnan Graizzaro & Associates
87 Summer Street, 5th Floor
Boston, MA

SUBJECT MATTER ON WHICH THE EXPERT IS EXPECTED TO TESTIFY

Mr. DiChaira is expected to testify concerning his determination of the business income loss associated with the insurance claim submitted by Hodan Properties related to the January 19, 2003 pipe-freeze and water damage loss that occurred at the Residence Inn, 181 Faunce Corner Road, North Dartmouth, Massachusetts.

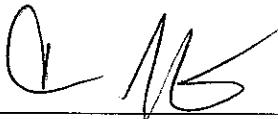
THE SUBSTANCE OF THE FACTS AND OPINIONS TO WHICH THE EXPERT IS EXPECTED TO TESTIFY

Mr. DiChaira is expected to testify that, based upon his investigation and calculations associated with the business income loss portion of the insurance claim related to the January 19, 2003 pipe-freeze, the damages incurred by Hodan Properties for that portion were in excess of \$440,348.76.

SUMMARY OF THE GROUNDS FOR EXPERT'S OPINION

Ms. DiChaira will testify based on his education and experience as a certified public accountant, as well as his investigation into the business income loss portion of Hodan Properties' insurance claim related to the January 19, 2003 pipe-freeze at the Residence Inn premises, located at 181 Faunce Corner Road, North Dartmouth, Massachusetts.

THE PLAINTIFF,

By: 
Erik Loftus, Esq.
Law Offices of Stuart G. Blackburn
Two Concorde Way
P. O. Box 608
Windsor Locks, CT 06096
860-292-1116
BBO# 656315

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CERTIFICATE OF SERVICE

| | | |
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I hereby certify that on August 21, 2006, a copy of foregoing Plaintiff Fireman's Fund 's Rule 26(a)(2)(A) Disclosure of Expert Witness was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Erik Loftus, Esq.
Erik Loftus, Esquire (BBO# 656315)
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